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6 Attorneys for Defendant  
REYES QUINONEZ  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 REYES QUINONEZ,

15 Defendant.  
16

Case No. 1:23-cr-00054-JLT-SKO

STIPULATION TO CONTINUE  
SENTENCING; ORDER

Date: January 27, 2025  
Time: 9:00 a.m.

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Reyes Quinonez, that the sentencing hearing  
20 currently scheduled for November 12, 2024, at 9:00 a.m. may be continued to January 27, 2025,  
21 at 9:00 a.m.

22 Mr. Quinonez entered a plea of guilty to Count One of the Indictment on August 19,  
23 2024. *See* Dkt. #45. The matter was then scheduled for sentencing on November 12, 2024. *See*  
24 Dkt. #45. The draft Presentence Investigation Report (PSR) was filed on September 30, 2024.  
25 *See* Dkt. #46. After review of the draft PSR, and in light of information contained therein,  
26 counsel for Mr. Quinonez has requested records from the California Department of Corrections  
27 and Rehabilitation. Historically, such records are provided within 1-2 months. Accordingly,  
28 counsel for Mr. Quinonez requires time to obtain these records in order to be adequately

1 prepared for sentencing. As a result, the parties are requesting that the sentencing hearing be  
2 continued to Monday, January 27, 2025, at 9:00 a.m.

3 The government does not oppose the continuance of the sentencing in this matter to the  
4 date proposed herein. The requested continuance is made with the intention of conserving time  
5 and resources for both the parties and the Court. The requested date is a mutually agreeable date  
6 for all parties. As this is a sentencing hearing, no exclusion of time is necessary.

7  
8 Respectfully submitted,

9 PHILLIP A. TALBERT  
10 United States Attorney

11 Date: October 8, 2024

/s/ Justin Gilio  
12 JUSTIN GILIO  
Assistant United States Attorney  
13 Attorney for Plaintiff

14 HEATHER E. WILLIAMS  
15 Federal Defender

16 Date: October 8, 2024

/s/ Reed Grantham  
17 REED GRANTHAM  
Assistant Federal Defender  
18 Attorney for Defendant  
REYES QUINONEZ

19  
20 **ORDER**

21 IT IS HEREBY ORDERED that the sentencing hearing scheduled for Tuesday,  
22 November 12, 2024, at 9:00 a.m. be continued to Monday, January 27, 2025, at 9:00 a.m.

23  
24 IT IS SO ORDERED.

25 Dated: **October 8, 2024**

26   
UNITED STATES DISTRICT JUDGE